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Hearing Date: February 25, 2025
Hearing Time: 3:00 p.m.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Upper Room Baptist Church,

Case No. 25-40070-nhl

Debtor.

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**MOTION OF 180 VAN BUREN LLC, TO APPOINT A CHAPTER 11 OPERATING
TRUSTEE**

TO: HONORABLE NANCY HERSHEY LORD
UNITED STATES BANKRUPTCY JUDGE

PLEASE TAKE NOTICE that 180 Van Buren LLC (“Van Buren”) herein, by and through its attorneys the Law Offices of Avrum J. Rosen, PLLC, shall move before the Honorable Nancy Hershey Lord, United States Bankruptcy Judge, on **February 25, 2025 at 3:00 p.m.** or as soon thereafter as counsel may be heard, for the entry of an Order, substantially in the form of the proposed Order pursuant to Sections 105 & 1104 of Title 11 of the United States Code and Rules 2007.1, 2008, 2010 & 6009 and 9006(b) of the Federal Rules of Bankruptcy Procedure, seeking the appointment of a Chapter 11 operating trustee for the Debtor..

PLEASE TAKE FURTHER NOTICE, that Judge Nancy Hershey-Lord conducts hearings telephonically and by videoconference. All participants must register with eCourt Appearances in advance of all telephonic and videoconference appearances. eCourt Appearances registration is required by both attorneys and non-attorney participants. Attorneys with a CM/ECF account may find the program under the “Utilities” menu after logging on to

CM/ECF. Those without CM/ECF accounts may access the program on the website at <https://ecf.nyeb.uscourts.gov/cgi-bin/nyebAppearances.pl>. Once registered, eCourt Appearances will email the telephone number and/or video link for your hearing. You may register for hearings weeks in advance, but the telephone number and/or video link will not be emailed to you until **48 hours before the hearing date**. Those registering with eCourt Appearances for hearings in less than 48 hours should allow up to 15 minutes after registration to receive the email with the telephone number and/or video link. Those unable to access eCourt Appearances must email Judge Nancy Hershey-Lord's Courtroom Deputy at: nhl_hearings@nyeb.uscourts.gov at least two (2) business days prior to the hearing. Your email must include your name, the case number(s), who you represent (if you are an attorney), hearing date, and phone number.

Below are the instructions to dial in for the telephonic appearance:

1. Dial in Number 888-363-4734
2. Access Code – 4702754
3. Announce who you are each time before speaking
4. Avoid the use of a speaker phone (use a landline if possible)
5. All persons not speaking should mute their phones
6. Speak up and enunciate so that you can be heard and understood

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Application must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, as modified by any administrative orders entered in this case, and be filed with the Bankruptcy Court electronically in accordance with the Administrative Orders of this Court, by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, Microsoft Word, DOS text (ASCII) or a scanned image of the filing, with a hard copy delivered

directly to Chambers, and be served in accordance with the Administrative Orders of this Court; and upon (i) Law Offices of Avrum J. Rosen, PLLC, counsel for the movant; and (ii) the Office of the United States Trustee, 201 Varick Street, Suite 1006, New York, New York 10014, so as to be received by no later than **February 18, 2025**.

PLEASE TAKE FURTHER NOTICE that only those objections that have been timely filed may be considered by the Court.

Dated: Huntington, New York
February 3, 2025

LAW OFFICES OF AVRUM J. ROSEN, PLLC
Attorneys for 180 Van Buren, LLC

BY: /s/ Avrum J. Rosen
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